

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

TRIUVA Kapitalverwaltungsgesellschaft mbH,	§	
	§	
	§	
	§	
Plaintiff,	§	CIVIL ACTION NO. 4:15-CV-02744
	§	
	§	
	§	
v.	§	
	§	
Baker Hughes, Inc. and Baker Hughes Oilfield Operations, Inc. d/b/a Baker Oil Tools, Inc.,	§	
	§	
	§	
Defendants.	§	

## SECOND JOINT STATUS REPORT

Pursuant to the Court’s June 27, 2016 Order (Dkt. No. 40), TRIUVA Kapitalverwaltungsgesellschaft mbH (“TRIUVA”), Baker Hughes Incorporated and Baker Hughes Oilfield Operations, Inc. (collectively, “Baker Hughes”) file this Second Joint Status Report.

The German arbitration remains on the schedule noted in the parties' initial Joint Status Report of June 14, 2016. The parties in the arbitration have completed their opening written submissions and have exchanged document productions. The second round of written submissions will be completed on October 28, 2016. The Claimant in the German arbitration has already submitted its second substantial brief and it is now for the Respondent in the arbitration to reply to this brief by October 28, 2016. A pre-hearing conference is scheduled for December 1, 2016, and the arbitration hearing will take place from January 16-23, 2017. Deadlines for

post-hearing briefing, which is customary but not mandatory, and statements of cost have not been set.

On December 15, 2015, the Court ordered a discretionary stay in this matter in favor of a pending German arbitration between distinct but related parties on the grounds that “the arbitration may illuminate the claims between these parties.” (Dkt. No. 36 (Order) at 1.) Since that time, the defendant in the arbitration—non-party Baker Hughes Germany—has refused to produce documents that TRIUVA contends are basic and critical to a determination of the issues in this action. In particular, Baker Hughes Germany has refused to provide any documents in the possession of the defendant in this action, Baker Hughes Inc., including documents that TRIUVA has identified as key documents in this case, notwithstanding document requests in the arbitration seeking their production. At the time of Baker Hughes’ original stay motion in this case, discovery in the German arbitration had not yet begun. Discovery in the arbitration is now complete.

Dated: August 29, 2016

Respectfully submitted,

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